

# **EXHIBIT 2**

May 1, 2020 cease and desist letter from  
Kerry S. Culpepper to Neil D. Greenstein



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PATENTS, TRADEMARKS & COPYRIGHTS

Via E-mail Only<ndg@techmark.com>

KERRY S. CULPEPPER \*

\* ADMITTED TO PRACTICE IN VIRGINIA, HAWAII  
AND BEFORE THE USPTO

May 1, 2020

Neil D. Greenstein

TechMark Greenstein Law, P.C.

1751 Pinnacle Drive, Suite 1000

Tysons, VA 22102

Re: Cease and Desist of Direct Copyright Infringement, Contributory Copyright Infringement at  
Hurricane Electric Subscriber IP addresses

My Reference and Case Number: 19-cv-169-LEK-KJM (District of Hawaii)

Dear Mr. Greenstein,

I am writing in reply to your email of 4/19/2020 in which you requested that I "...identify the clients [I] represent and the IP address on which [my] clients' rights have allegedly been infringed."

At least the following motion pictures of my clients were confirmed infringed at HE IP addresses as of March 18, 2020.

NO.	OWNER	MOTION PICTURE
1	Millennium Funding, Inc.	<i>Mechanic: Resurrection</i>
2	Bodyguard Productions, Inc.	<i>The Hitman's Bodyguard</i>
3	UN4 Productions, Inc.	<i>Boyka: Undisputed IV</i>
4	Homefront Productions, Inc./ Millennium	<i>Homefront</i>
5	Dallas Buyers Club, LLC	<i>Dallas Buyers Club</i>
6	Glacier Films 1, LLC	<i>American Heist</i>

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7	Criminal Productions, Inc.	<i>Criminal</i>
8	Clear Skies Nevada, LLC/Voltage	<i>Good Kill</i>
9	Cook Productions, LLC	<i>Mr. Church</i>
10	WWE Studios Finance Corp	<i>Eliminators</i>
11	Hunter Killer Productions, Inc.	<i>Hunter Killer</i>
12	LHF Productions, Inc.	<i>London Has Fallen</i>
13	Rambo V Productions, Inc.	<i>Rambo V: Last Blood</i>
14	Fallen Productions, Inc.	<i>Angel Has Fallen</i>
15	Wicked Nevada, LLC	<i>Extremely Wicked Shockingly Evil and Vile</i>
16	MON, LLC/ Voltage	<i>Welcome Home</i>
17	211 Productions, Inc./ Millennium	<i>211</i>
18	TBV Productions, LLC/Voltage	<i>I Feel Pretty</i>
19	CELL Film Holdings, LLC	<i>Cell</i>
20	Fathers & Daughters Nevada, LLC/Voltage	<i>Fathers and Daughters</i>
21	Venice PI, LLC	<i>Once Upon a Time in Venice</i>
22	I am Wrath Production, Inc.	<i>I Am Wrath</i>
29	HB Productions, Inc.	<i>Hellboy</i>
31	Headhunter, LLC	<i>A Family Man</i>

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34	POW Nevada, LLC/Voltage	<i>Revolt</i>
35	Status Update, LLC/Voltage	<i>Status Update</i>
36	Stoic Productions, Inc. /Millennium	<i>Acts of Vengeance</i>
37	Killing Link Distribution, LLC	<i>Kill Chain</i>
38	Cobbler Nevada, LLC/Voltage	<i>The Cobbler</i>
39	Survivor Productions, Inc.	<i>Survivor</i>

I further reserve the right to supplement the above list.

I have attached an excel spreadsheet with all IP addresses at which my clients motion pictures have been infringed.

I look forward to hearing back from you by May 15, 2020 so that we can discuss this issue further.

This letter is written without prejudice to the rights and remedies of our client, all of which are expressly reserved.

Sincerely,

/ksc/

Kerry S. Culpepper

[kculpepper@culpepperip.com](mailto:kculpepper@culpepperip.com)